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24 *Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

25 *[Additional Counsel Listed on Signature Page]*

26 **UNITED STATES DISTRICT COURT**

27 **NORTHERN DISTRICT OF CALIFORNIA**

28 IN RE TEZOS SECURITIES LITIGATION

29 Master File No. 17-cv-06779-RS

30 **CLASS ACTION**

31 **STIPULATION AND [PROPOSED]  
32 ORDER TO ADD NEW PLAINTIFF AND  
33 WITHDRAW FIRST AMENDED  
34 COMPLAINT**

35 Judge: Hon. Richard Seeborg

1        WHEREAS, Lead Plaintiff Arman Anvari filed a Consolidated Complaint (“Complaint”)  
2 (Dkt. No. 108) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung, (“Tezos  
3 Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”), Draper  
4 Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin Suisse”);

5        WHEREAS, on August 7, 2018, and August 31, 2018 the Court issued orders (Dkt. Nos. 148  
6 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates Crypto  
7 and Bitcoin Suisse (collectively, the “Dismissed Defendants”), and dismissing the Dismissed  
8 Defendants from this action with prejudice;

9        WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman and  
10 Arthur Breitman (collectively, “Defendants”) filed their answers (Dkt. Nos. 168-171) to the  
11 Complaint;

12        WHEREAS, Lead Plaintiff seeks to add a plaintiff, Pumaro LLC, to the action;

13        WHEREAS, on November 12, 2018 Lead Plaintiff filed an Amended Consolidated Complaint  
14 (Dkt. No. 180) adding Pumaro LLC as a plaintiff;

15        WHEREAS, on or around November 12, 2018, the Dismissed Defendants objected to being  
16 included as named parties in the Amended Consolidated Complaint;

17        WHEREAS, Lead Plaintiff and Defendants have agreed that Pumaro LLC may be added to  
18 the Complaint without the need to file an amended pleading and, therefore, amended answers by  
19 Defendants;

20        IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of  
21 Lead Plaintiff and Defendants that:

22            (a)        The Amended Consolidated Complaint is withdrawn and should be stricken from the  
23 Court’s docket in the above-captioned matter;

24            (b)        The Complaint is amended to add plaintiff Pumaro LLC and the following allegation  
25 as paragraph 14a:

26        Plaintiff Pumaro LLC (“Pumaro”) is a Texas limited liability company which  
27 invested 1.9 Bitcoin in the Tezos ICO on July 1, 2017. Pumaro was promised  
28 delivery of 11,400 Tezos tokens upon the conclusion of the Tezos ICO and the  
launch of the Tezos network.

1  
2 (c) Defendants, and each of them, answer paragraph 14a as follows :

3 Defendants are without sufficient knowledge or information to form a belief as  
4 to the truth of the allegations in paragraph 14a pertaining to the residency of  
5 Pumaro and its alleged contribution to the Fundraiser, and on that basis deny  
6 them. Except as expressly admitted, Defendants deny each and every  
7 remaining allegation of paragraph 14a.

8 Stipulated and agreed to by:

9 Date: November 20, 2018

10 Respectfully Submitted,

11 LTL ATTORNEYS LLP

12 DAVIS POLK & WARDWELL LLP

13 By: s/ Enoch H. Liang

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*Attorneys for Defendant Dynamic Ledger  
Solutions, Inc.*

1 IT IS SO ORDERED. The Clerk of the Court is instructed to strike from the Court's files  
2 Docket Entry Number 180.

3  
4 Dated: November \_\_\_\_, 2018

5  
6 The Hon. Richard Seeborg  
7 United States District Judge

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